



Graves For Congress  
2345 Grand Boulevard  
Suite 2800  
Kansas City, MO 64108

Phone (816) 292-2000  
Fax (816) 292-2001

Website:  
www.gravesforcongress.com  
Email:  
sam@gravesforcongress.com

April 21, 2006

**VIA FEDEX**

Ms. Vicki Hubbard  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 64108

Re: Letter of March 23, 2006, regarding Year End 2005 Report of Graves for Congress, Identification Number C00359034

Dear Ms. Hubbard:

I am responding to your letter of March 23, 2006, requesting certain additional items of information with regard to the Year End Report (10/01/05 - 12/31/05) of Graves for Congress. In addition to filing our amended report for that period electronically, this letter responds to other information you requested and advises you of the corrective actions we have taken.

You attached a list of contributions that appeared from our previously-filed report to have exceeded the contribution limits for the Primary 2006 election cycle. As is indicated in our amended report, all except two were the result of data entry errors on our part. Four of the contribution checks were marked by the contributor as being intended for the General 2006 election cycle. Copies of those checks are enclosed. Two of the checks do appear not to have been properly designated and checks refunding the contribution or portion of the contribution in excess of federal limits have been issued to those contributors. Although we believe the contributors intended for the checks to be for the General Election, it is too late for a redesignation, so we made the required refunds. Copies of those checks and the letters to the contributors are also enclosed.

You inquired regarding Line 1 of FEC Form 3Z-1 of the report. Our software does not automatically carry that amount forward from the underlying data, and we neglected to manually enter the amount at the time the report was generated. We have corrected that issue in the amended report.

Finally, you raised the issue of our itemization of all contributions, regardless of the aggregate total for a particular contributor. We have always reported these contributions believing that more disclosure was better than less and had not been

CC 1595596v1

RECEIVED  
FEDERAL  
OPERATIONS CENTER  
2006 APR 25 A 10:21\*

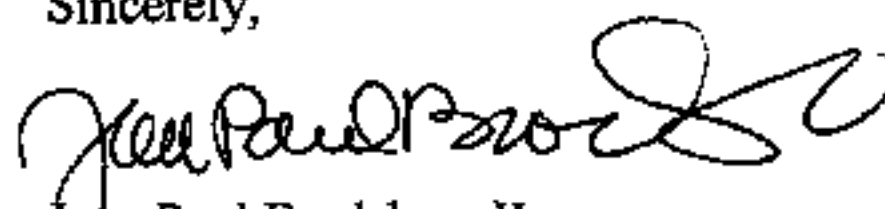
26039060440

Ms. Vicki Hubbard  
April 21, 2006  
Page 2

advised that this was in error. Our software does not put these contributions into a separate Schedule A, so we will not itemize these contributions unless the aggregate from the contributor exceeds \$200. We have corrected that in our amended report, and we used that methodology as well in our recently-filed 2006 First Quarter report.

I believe that addresses the matters raised in your letter. If you need additional information, please let me know. Thank you for your assistance with these matters.

Sincerely,



Jean Paul Bradshaw II  
Treasurer


Enclosure

4337

AMOUNT  
\*\*\*\$5,000.00

AMOUNT  
\*\*\*\$5,000.00

 Security features. Details on back.


  
 AIRCRAFT OWNERS AND PILOTS ASSOCIATION  
 POLITICAL ACTION COMMITTEE  
 421 Aviation Way, Frederick, MD 21701  
 Five Thousand & 000 000 000 000

Graves For Congress

21  
22  
23  
24  
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30

091084 / 12-04



AMERICAN BANKERS ASSOCIATION  
QUALIFIED MULTI-CANDIDATE COMMITTEE  
120 CONNECTICUT AVENUE, N.W.  
WASHINGTON, DC 20005

SUNTRUST BANK  
ACH RT 061000104  
BS-270-550

PAY TO THE ORDER OF  
Graves for Congress

One thousand and no/100

Date: 10-31-05

\$ 1,000.00

11284

DOLLARS

MEMO  
General 2006 Contribution

⑈011284⑈ ⑆055002707⑆ 052021145⑈

*Stanley L. Hill*  
*Spencer*

37709065092

**ANHEUSER-BUSCH  
POLITICAL ACTION COMMITTEE  
(ABPAC)  
A MULTI CANDIDATE COMMITTEE**

US BANK - MISSOURI  
EDWARDSVILLE, IL 62025  
4-21/810

3159

November 22, 2005

PAY TO THE  
ORDER OF Graves for Congress - 2006 General

\$ 2,000.00

Two thousand and no/100

DOLLARS

MEMO 2006 General

AUTHORIZED SIGNATURE

⑈003159⑈ ⑆081000210⑆ 107000159E⑈

Security Features Included

Details on Back

74709065092

UNION PACIFIC CORPORATION FUND FOR  
EFFECTIVE GOVERNMENT  
800 THIRTEENTH STREET, NW SUITE 340  
WASHINGTON, DC 20005

Two Thousand Five Hundred & 00/100 Dollars

WELLS FARGO BANK NEBRASKA, N.A.

27-5/1040

2636

DATE

10/25/2005

AMOUNT

\*\*\*\$2,500.00

Memo: 2006 US GENERAL ELECTION

PAY  
TO THE  
ORDER  
OF:

Graves For Congress  
4701 NW 82nd Street  
Kansas City, MO 64151

AUTHORIZED SIGNATURE

⑈002636⑈ ⑆104000058⑆ 0687169748⑈

Security features. Details on back.

54709063092



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[sam@gravesforcongress.com](mailto:sam@gravesforcongress.com)

April 21, 2006

Mr. Steve Hall  
Vice President, Government Affairs  
American Council of Engineering Companies  
Political Action committee  
1015 - Fifteenth Street, N.W.  
Washington, D.C. 20005-2605

Dear Mr. Hall:

In reviewing the contribution records for the Graves for Congress Committee, we have discovered that ACEC/PAC has inadvertently made contributions in excess of federal limits for the 2006 primary campaign. Our records reflect that ACEC/PAC made \$1,000 contributions on March 30 and June 29, 2005. On December 21, 2005, ACEC/PAC made a \$5,000 contribution that was also designated for the primary 2006 election cycle. As you know, political action committees are limited to \$5,000 contributions for each election cycle.

The time for re-designating a portion of the December 21 contribution for the 2006 general election has passed. Therefore, I am enclosing a check in the amount of \$2,000 as refund of the portion of the contribution that exceeds federal limits. As always, we value very much ACEC/PAC's support.

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Jean Paul Bradshaw II".  
Jean Paul Bradshaw II  
Treasurer

Enclosure

CC 1601266v1

26039060446

GRAVES FOR CONGRESS

0401

2210

4701 NW 82ND ST.  
KANSAS CITY, MO 64151-1102

DATE 4/21/06

(8-3/1010 MD  
702

PAY TO THE ORDER OF American Council of Engineering Companies PAC \$2,000.00

Two Thousand and 00/100

DOLLARS

Bank of America

Bank of America

ACH RT 081000022



The Private Bank

FOR Refund excessive contribution

⑈002210⑈ ⑆101000035⑆ 003475898479⑈

John Paul Reed

47503065092





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[sam@gravesforcongress.com](mailto:sam@gravesforcongress.com)

April 21, 2006

Mr. Erik C. Pelletier  
Senior Manager  
Government Relations  
General Electric  
1299 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004

Dear Erik:

In a review of the contribution records for the Graves for Congress committee, we have discovered that the General Electric PAC has inadvertently made contributions in excess of federal limits for the 2006 Primary campaign. Our records reflect \$1,000 contributions from GE/PAC on June 30 and December 21, 2005. Our records also reflect a \$4,000 contribution on September 28, 2005 from the Penske Truck Leasing Political Action Committee, which we understand to be an affiliated PAC of GE/PAC. All three of these contributions were designated for the 2006 primary election cycle. As you know, political action committees are limited to \$5,000 contributions for each election cycle.

Since the committees are affiliated and our time for re-designation of the contribution has passed, we must refund the \$1,000 contribution received in December. A check in that amount is enclosed.

As always, we very much appreciate the strong support shown by GE/PAC, as well as the Penske Truck Leasing/PAC.

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Jean Paul Bradshaw II", written in a cursive style.

Jean Paul Bradshaw II  
Treasurer

26039060448

GRAVES FOR CONGRESS

04-01

2211

4701 NW 82ND ST.  
KANSAS CITY, MO 64151-1102

DATE 4/21/06

18-3/1010 MD  
702

PAY TO THE ORDER OF General Electric Company PAC \$ 1,000.00

One Thousand and 00/100 DOLLARS

Bank of America



ACH RPT 081900032

The Private Bank

FOR Refund of Excessive Contribution

⑈002211⑈ ⑈101000035⑈ 003475878479⑈

*Paul Paul Paul*

67703065092

Federal Election Commission  
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Delivery Confirmation™ or Signature Confirmation™ Label <input type="checkbox"/>	

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<input type="checkbox"/> Postmark Illegible	
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<input type="checkbox"/> No Postmark	
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	4/25/06
PREPARER	DATE PREPARED